

medley Farm
10.14
Clerk

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 7:86-252-3
RALPH C. MEDLEY; et al.,)	
)	
Defendants.)	

DEFENDANT NATIONAL STARCH AND CHEMICAL
CORPORATION'S RESPONSES TO DEFENDANT
MILLIKEN & COMPANY'S REQUEST FOR
PRODUCTION OF DOCUMENTS - FIRST SET

Pursuant to Rules 26 and 34 of the Federal Rules of
Civil Procedure, National Starch and Chemical Corporation responds
as follows:

RESPONSE TO REQUEST FOR PRODUCTION

1.

There are no documents.

2.

All documents relating to waste disposal activities at
the site for the years 1974 to 1976 will be produced in accordance
with Rule 34(b) for review and copying at the National Starch and
Chemical Corporation facility located at Woodruff, South Carolina.

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3.

All documents relating to waste disposal activities at the Love Springs Site for the years 1974 to 1976 will be produced in accordance with Rule 34(b) for review and copying at the National Starch and Chemical Corporation facility located at Woodruff, South Carolina.

4.

All documents relating to waste disposal activities with Medley Concrete Works have been produced in response to Request No. 2.

5.

All documents relating to waste disposal activities with Piedmont Industrial Survices have been produced in response to Request No. 3.

6.

The only documents relating to products and the individual components of these products made by the Chas. S. Tanner Company, are "Batch Records." The National Starch and Chemical Company objects to the production of the Batch Records which are proprietary information because they contain the exact formulation of each product produced by the National Starch and Chemical Corporation, or its predecessors. However, the

attached list, produced in response to Interrogatory No. 6, shows all of the products made during this period and the ingredients used, without indentifying the amount of each ingredient.

7.

There are no specific records which describe the kinds of wastes which were sent to the Medley Farm Site.

8.

There are fifteen boxes or "file drawers" of invoices for items bought and received during the period 1974 through 1976. These documents are available for review and copying in accordance with Rule 34(b) at the National Starch and Chemical Corporation facility located at Woodruff, South Carolina.

9.

Documents relating to government notification of waste activities dating from 1976 to the present for the National Starch and Chemical Corporation facility are located at the Woodruff, South Carolina facility and are available for inspection at the Woodruff facility in accordance with Rule 34(b). No other documents are available for production.

10.

No documents are available for production.

11.

No documents are currently available for production, but if documents do become available they will be produced in a supplemental response as provided in Rule 26(c).

12.

All documents relating to financial information concerning the disposal activities for facilities identified in response to Interrogatory No. 1 for the years 1974 to 1976 have been produced in response to Request Nos. 2 and 3.

Charles H. Tisdale, Jr.

Charles H. Tisdale, Jr.

KING & SPALDING
2500 Trust Company Tower
Atlanta, GA 30303
404-572-4600

Julius W. McKay

Julius W. McKay

MCKAY & GUERARD
P. O. Drawer 7157
Columbia, SC 29202
803-765-2396

Attorneys for National Starch
and Chemical Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have made due and lawful service of the foregoing pleading upon all parties to this action or their counsel by causing a copy of said pleading to be mailed to all parties or their counsel at the following addresses:

Wade S. Weatherford, III
P. O. Box 41
Gaffney, SC 29340

Richard H. Willis
Nelson, Mullins, Grier & Scarborough
P. O. Box 11070
Columbia, SC 29211

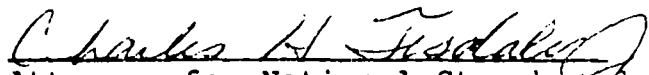
James W. Potter
Thomas, Mann and Hutson
Suite 2200 The Daniel Building
Greenville, SC 29602

G. Stephen Manning
Environmental Enforcement Section
Hazardous Waste Section
Department of Justice
Room 1248
10th & Pennsylvania Avenue, N.W.
Washington, D.C. 20530

John P. Britton
Rainey, Britton, Gibbes & Clarkson
P. O. Box 10589
Greenville, SC 29603

Ralph M. Mellom
Ogletree, Deakins, Nash,
Smoak and Stewart
P. O. Box 2757
Greenville, SC 29602

This 7 day of May, 1986.


Attorney for National Starch and
Chemical Corporation